

Telephone: 979/696-6531

Opinions and

Conclusions: Plaintiffs incorporate the expert opinion of James Lock (attached hereto as Exhibit "1" are his Expert Report (1612-003163/3175), Curriculum Vitae (1612-003176/3188), Fee Schedule (1612-003189) and Testimony List for James R. Lock (1612-003457/3478), which contains a synopsis of the opinions and conclusions of Mr. Lock. Plaintiffs further incorporate the deposition testimony of James Lock, which will be given in this cause. Mr. Lock's entire fire including the documents, which he reviewed in arriving at his opinions, is available for inspection and copying at a mutually convenient time and location and is incorporated herein by reference.

Name: Troy Cottles

Address: Tire Failure Analyst and Design Consultant
25884 Katpaugh Lane
Toney, Alabama 35773

Telephone: 256/423-8338

Opinions and

Conclusions: Plaintiffs incorporate the expert opinion of Troy Cottles (attached hereto as Exhibit "2" are his Expert Report (1612-003479/3505), Curriculum Vitae (1612-003506/3508), Fee Schedule (1612-003509) and Deposition Testimony History (1612-003511), which contains a

synopsis of the opinions and conclusions of Mr. Cottles. Plaintiffs further incorporate the deposition testimony of Troy Cottles, which will be given in this cause. Mr. Cottles' entire file including the documents, which he reviewed in arriving at his opinions, is available for inspection and copying at a mutually convenient time and location and is incorporated herein by reference.

MEDICAL PROVIDERS

3. The following persons may be called to testify in their expert capacity regarding the medical care and treatment rendered to Plaintiffs. These persons are being listed as expert witnesses, however, they have not been retained by Plaintiffs in this cause and as such are not under the control of Plaintiffs. The general subject matter of these experts' opinions is as follows: nature and degree of Plaintiffs' mental and physical injuries, manner of injury and care provided, prognosis, authenticity of records, and reasonableness and necessity of treatment and charges therefor. The bases for these experts' opinions include, but are not limited, medical records available to all parties and physical and mental examinations of the plaintiffs. In reaching their opinions that they may give at trial or upon deposition, it is presumed that these experts will rely not only on the medical records, but also their education, training and experience, medical texts, and relevant scientific and medical literature. Those persons are as follows:

- a. Department of Veterans Affairs
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records

2101 South Colonel Rowe Boulevard

McAllen, Texas 78503

956/618-7100

b. Nuestra Clinica Del Valle

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

801 W. 1st Street

San Juan, Texas 78589

956/787-2021

c. Neurology & Neurophysiology Center

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

Zuka Khabbaze, M.D.

4417 N. McColl Road

McAllen, Texas 78504

956/664-1999

d. Family Practice Center

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

Manuel Sanchez, M.D.

501 North Ware Road

McAllen, Texas 78501

956/687-8531

- e. Jackson Imaging Center
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
Chassan Hammami, M.D.
Jackson Village
5416-A South Jackson Road
Edinburg, Texas 78539
956/687-4944
- f. Dr. Ruben Salinas
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
5513 N. McColl Road
McAllen, Texas 78504
956/994-1000
- g. Dr. Norma Iglesias & Associates
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
Iglesias Plaza
712 S. Cage
Pharr, Texas 78577
956/783-1900

- h. Pain Management
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
Rashid Shamid, M.D.
801 Nolana Loop
McAllen, Texas 78504
956/687-8120
- i. Keith Norvill, D.O.
Crossroads Neurosurgical Associates
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
2700 Citizens Plaza, Suite 200
Victoria, Texas 77903-4350
361/574-1511
- j. Miguel A. Hernandez, M.D.
McAllen Bone & Joint Clinic, P.A.
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
Orange Medical Plaza
1421-A N. 2nd Street
McAllen, Texas 78501
956/618-4414

k. Jumar Apolinario, M.D.

Valley PM&R Specialists, P.A.

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

1200 E. Savannah, Suite 10

McAllen, Texas 78503

956/668-9900

l. Oscar A. Alvarez, M.D.

South Texas Gastroenterology Associates

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

5525 Doctors Drive

Edinburg, Texas 78539

956/682-4800

m. Ana C. Posada, M.D.

and/or its doctors, nurses, technicians, employees, representatives, agents

and/or custodian of records

801 E. Nolana, Suite 9

McAllen, Texas 78504

- n. McAllen Medical Center
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
301 West Expressway 83
McAllen, Texas 78503
956/632-4000
- o. Dr. Derrick Garrett
Citizens Medical Center
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
2701 Hospital Drive
Victoria, Texas 77901
361/572-5117
- p. Juan Aguilera, M.D.
Pharr Children's Day & Night Clinic
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
807 N. Cage
Pharr, Texas 78577
956/782-7993

- q. Mike Sweeney, M.D.
Renaissance Orthopaedics
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
512 East Dove
McAllen, Texas 78501
956/664-2600
- r. James B. Giles, M.D.
Orthopaedic Associates
and/or its doctors, nurses, technicians, employees, representatives, agents
and/or custodian of records
2700 E. 29th Street, Suite 100
Bryan, Texas 77802
979/731-8888
- s. Regional Medical Laboratory
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
2710 Hospital Drive #106
Victoria, Texas 77901
361/575-0636
800/333-9107

- t. Citizens Medical Center

 and/or its doctors, nurses, technicians, employees, agents, representatives

 and/or custodian of records

 2701 Hospital Drive

 Victoria, Texas 77901

 361/573-9181
- u. Victoria Radiology Associates

 and/or its doctors, nurses, technicians, employees, agents, representatives

 and/or custodian of records

 P.O. Box 3610

 Victoria, Texas 77903

 361/578-0317
- v. Victoria Anesthesiology Associates

 and/or its doctors, nurses, technicians, employees, agents, representatives

 and/or custodian of records

 1501 East Mockingbird Lane, Suite 220

 Victoria, Texas 77904

 361/573-2481

- w. VIP Home Health Care
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
200 Sam Houston Avenue
Pharr, Texas 78577
956/787-5999
- x. Diego Rodriguez, M.D.
and/or his doctors, nurses, technicians, employees, agents,
representatives and/or custodian of records
801 East Nolana Street, Suite 9
McAllen, Texas 78504
956/687-8000
- y. Cardiovascular Consultants
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
1801 South 5th Street, Suite 130
McAllen, Texas 78503
956/687-7863

- z. Maria A. Macias, M.D.
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
1801 South 5th Street, Suite 211
McAllen, Texas 78503
956/686-4824
- aa. Audie L. Murphy Memorial Veterans Hospital
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
7400 Merton Minter Boulevard
San Antonio, Texas 78229
- bb. Lionel Rangel, M.D.
and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records
Knapp Medical Plaza
1330 E. 6th Street, Suite 305
Weslaco, Texas 78596
956/968-9596

cc. Intermedix

and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records

P.O. Box 940249

Houston, Texas 77094

281/398-8999

dd. Radiology Associates

and/or its doctors, nurses, technicians, employees, agents, representatives
and/or custodian of records

3560 Delaware, Suite 209

Beaumont, Texas 77706

409/899-3682

SCENE RESPONDERS/OFFICIALS/INVESTIGATORS/MEDICAL EXAMINER

4. The following persons may be called to testify in their expert capacity regarding the investigation of the accident in question and the treatment rendered to Plaintiffs. These persons are being listed as expert witnesses, however, they have not been retained by Plaintiffs in this cause and as such are not under the control of Plaintiffs. Plaintiffs may call to testify as expert witnesses in this cause, any and all custodians of records for any and all individuals or entities identified in any discovery response, depositions, or documents produced during discovery, including the custodians of records for those individuals or entities identified above, who may be called to testify regarding the authenticity of any and all such records and the amount and reasonableness of any charges reflected in such records, whose records will serve as their reports. Those persons are as follows:

Name: Trooper Anthony Owens

Address: Texas Department of Public Safety
Victoria, Texas 77901
361/578-2771

Name(s): Larry West, EMT
Jonathan Martin, EMT

Address: Victoria Fire Department
606 E. Goodwin
Victoria, Texas 77901

Name(s): Keith Leali, Dale Schimmoeller, Dennis Powell, Richard Stephens, and
Dewey Beach

Address: by and through Cooper Tire & Rubber Company and its attorney of
record.

Plaintiffs will also call present and former Cooper employees and other witnesses yet to be identified by Cooper in response to Plaintiffs' discovery requests. The above listed employees of Cooper Tire & Rubber Company are some of the persons within the Cooper organization who have information relevant to the subject matter of this suit (*i.e.* the tire). These Cooper employees (former and present) have been deposed in other litigation against Cooper, and Plaintiffs intend to rely upon such depositions and other discovery herein (and offer evidence from these other depositions for the trial of this case).

5. Plaintiffs may call to testify as expert witnesses in this cause, any and all custodians of records for any and all individuals or entities identified in any discovery response, depositions, or documents produced during discovery, including the custodians of records for those individuals or entities identified above, who may be called to testify regarding the authenticity of any and all such records and the amount and reasonableness of any charges reflected in such records, whose records will serve as their reports.

CROSS-DESIGNATION OF EXPERTS

6. Plaintiffs hereby cross-designate and state that they may call any expert identified or designated by an adverse party or an employee or representative of an adverse party to elicit expert opinions subject to any objections Plaintiffs make concerning the designation of such experts, and the admissibility of their opinions.

7. Plaintiffs reserve the right to elicit opinion testimony, either through direct examination or cross-examination, of all witnesses designated or identified by any party. Plaintiffs reserve the right to call unidentified rebuttal witnesses, whose testimony cannot be predicted at this time to offer opinion testimony in response to opinions offered by witnesses of any party. Any fact witnesses designated by Plaintiffs may offer lay opinions regarding matters within their knowledge.

8. Plaintiffs expressly reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate same as a consulting expert only, who cannot be called by opposing counsel.

9. This designation shall serve to supplement any Answers to Interrogatories, Responses to Request for Production and Responses to Requests for Disclosure as propounded by any Defendants.

Respectfully submitted,

s/Roger S. Braugh, Jr.

Roger S. Braugh, Jr.
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Federal I.D. No. 21326
SICO, WHITE & BRAUGH, L.L.P
802 N. Carancahua, Ste. 900
Corpus Christi, TX 78470
Phone: (361) 653-3300
Fax: (361) 653-3333

ATTORNEY-IN-CHARGE FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all parties in compliance with the Federal Rules of Civil Procedure by first class mail, postage prepaid or by electronic mail from the clerk of the court on the 25th day of July 2006.

s/Roger S. Braugh, Jr.
Roger S. Braugh, Jr.